

EXHIBIT 15

DECLARATION OF DAVID FERNANDEZ

I, David Fernandez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am at least 18 years of age and am competent to sign this declaration. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am 45 years old. I am a citizen of Mexico. I came to the United States nearly 18 years ago in June 2002 by walking across the border.
3. Since coming to the United States, I have been consistently employed in labor jobs, including farming, construction, and roofing. I am happy to be able to work and care for myself in a safe country.
4. Before I was detained, I lived with my friends in South Carolina. I am fortunate to have a close community of friends in South Carolina, whom I miss very much.
5. I am currently detained at Folkston ICE Processing Center in Folkston, Georgia ("Folkston"). I have been detained here since approximately December 31, 2019 after spending about eleven days in Irwin County Detention Center. I was detained after being arrested for a DUI on September 15, 2019. I am seeking asylum in the United States.

6. Three years ago, I was diagnosed with diabetes. I have also suffered from Tuberculosis, which was thirteen years ago. It was very scary and caused me to throw up blood.
7. My diabetes is a serious disease. A doctor told me that if I do not regulate my blood sugar levels, I am at risk of suffering a heart attack. Prior to my detention in Folkston, I was able to manage it well. I managed my diabetes by taking insulin injections twice daily and routinely visiting my doctor. I was able to keep my blood sugar levels in control and was feeling well.
8. Since being detained in Folkston, however, my health has deteriorated. The medical staff helps me check my sugar every morning and night, and my sugar levels, particularly at night, have been very high. I have been feeling very sick—at times, I feel so tired and weak that I cannot even stand up. I do not get my insulin injections twice a day as is needed to keep my diabetes under control and stay well. I am not allowed to administer the insulin injections myself, so I can only get the injections when one of the two nurses or the doctor at Folkston gives them to me. The doctor does not care to give me the injections at all. Some weeks I only get three injections over the entire seven days, even though I am supposed to get 14 injections per week. I have tried to ask for the injections, but the staff rejects my requests. When this happens, I usually go back to my room and pray that I will not have a heart attack.

9. The living conditions at Folkston are very crowded and unhygienic. There are currently about 30-35 people in my pod unit.
10. I sleep in a small dorm room in a bunkbed. Until about two weeks ago, I had a roommate, who slept less than two feet away from me. Now I am the only person in my room, but if more people are detained here, I will likely get a new roommate.
11. Outside of my dorm there is a common area in the pod unit. The common room is usually crowded. Everyone often sits or stands very close together in that room and coming into contact with other people is unavoidable. There is no way to stay six feet away from other people.
12. All the detained immigrants in my pod use the same area and equipment to cook food we purchase in the commissary.
13. We come in contact with ICE and facility officers frequently because they do three checks of our bodies each day. The guards also sometimes do checks in our rooms. They wear gloves but do not wear face masks.
14. Detained people at Folkston are responsible for cleaning the facility. However, the group that cleans does not have any chemicals with which to properly clean and kill germs and bacteria.
15. We are only given small bags of soap each week with which to wash our hands and bodies. The small amount of soap is not enough to properly clean

ourselves, and I often have to go to the commissary to buy more if I have the funds.

16. There is no hand sanitizer available in the commissary or anywhere in the detention center. There are also no face masks available to detained people.

17. I try hard to keep myself and my room clean and hygienic, but it is very difficult since I never have enough soap and do not have proper cleaning supplies, including disinfectants. Other detained people do not put any effort into keeping themselves and their rooms or the common area clean and hygienic.

18. None of the guards or other staff at Folkston have provided me with any information about the COVID-19 outbreak. I only know about it because of the news.

19. There have been no changes implemented at Folkston due to the COVID-19 outbreak that I know of, except that, recently, we have not been allowed to go outside to the yard.

20. I have not seen any increase in cleaning, cleaning supplies, or other hygienic practices since the COVID-19 outbreak. We are still not even provided with enough soap to clean our hands and bodies each day.

21. I have not seen or heard of any detained immigrants being quarantined due to potential COVID-19 infection or to protect vulnerable people from

contracting COVID-19.

22.I have not seen any detained immigrants, guards, or other facility staff members wearing face masks.

23.I have not seen any detained immigrants, guards, or other facility staff members use hand sanitizer.

24.I have recently had flu-like symptoms, and I know other detained people have recently had flu-like symptoms, but neither I nor any other detained immigrant or guard or staff member that I know of has been tested for COVID-19.

25.There is no way to go without touching other detained people, guards, and staff members each day, and no way to touch items, such as cooking tools, that have not been touched by many other detained people each day without being cleaned in between uses.

26.There are still new immigrants coming to Folkston from other detention centers, jails, and prisons. There are still also people coming to visit people detained here.

27.I understand from what I hear on the news that, because of my diabetes – and, in particular, my sickness due to the lack of insulin and other medical care – if I were to contract COVID-19, I would be at a high risk of severe illness or death.

28.I feel scared and helpless because there is nothing I can do to protect myself

from contracting COVID-19 if another detained immigrant, guard, staff member, or visitor were to be infected.

29.Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

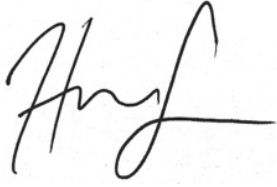
30.If I am released from detention, I will go back to my home in South Carolina where I live with my friends. I will be able to practice social distancing and keep myself and my living area clean and hygienic. I will also be able to see my regular doctor and get my diabetes back under control.

31.If I am released from detention, I will comply with any applicable conditions of release, including attending check-ins and immigration court hearings.

32.I have worked closely with my attorneys to prepare this declaration. I have authorized my attorney to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 3, 2020 at Decatur, Georgia.



Hillary Li, on behalf of David Fernandez

CERTIFICATION OF TRANSLATION

I, Carmen Martinez, declare that I am proficient in the English and Spanish languages.

On April 3, 2020, I read the foregoing declaration to David Fernandez and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2020.



Carmen Martinez

ATTORNEY DECLARATION

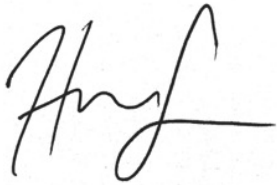
I, Hillary Li, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Hillary Li. I am a licensed attorney in good standing in the state of Georgia.
2. I represent the declarant, David Fernandez, in this litigation. Out of necessity, I signed David Fernandez's declaration on his behalf with his express consent.
3. ICE is oftentimes requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized to hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Center for Disease Control and Protection (CDC) issued statements warning that individuals are at a higher risk of infection when traveling.
5. In light of the above, to protect the public health, I am not able to travel to Folkston, Georgia, to obtain my clients' signature.

6. With the assistance of Carmen Martinez, who is proficient in both English and Spanish languages, I spoke with David Fernandez over the phone and read the above declaration to him and confirmed the accuracy of the information therein. David Fernandez has confirmed that I can sign on his behalf, as reflected in his declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 3, 2020 at Decatur, Georgia.



Hillary Li

Attorney for Plaintiffs

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